

1 BRIAN P. CLARK  
Nevada Bar No. 4236  
2 LUKAS B. McCOURT  
Nevada Bar No. 11839  
3 CLARK MCCOURT  
7371 Prairie Falcon Road, Suite 120  
4 Las Vegas, Nevada 89128  
Telephone: (702) 474-0065  
5 Facsimile: (702) 474-0068  
bpc@clarkmccourt.com  
6 lmccourt@clarkmccourt.com  
Attorneys for Defendants  
7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 PAUL D. S. EDWARDS,

11 Plaintiff,

12 v.

13 TIMESHARE LIQUIDATORS, LLC, a/d/b/a  
TCL RESORT LIQUIDATORS, a/d/b/a TLC  
14 RESORTS VACATION CLUB, LLC, a/d/b/a  
TLC RESORTS VACATION CLUB, a/d/b/a  
15 TLC RESORTS, a/k/a TLCRESORTS.COM,  
a/d/b/a TLC TRAVEL, a/d/b/a VIP TRAVEL,  
16 a/d/b/a VIP VACATIONS, and PLAZA  
HOTEL & CASINO, LLC, a/d/b/a PLAZA  
17 HOTEL & CASINO, and STANLEY C.  
MULLIS, a/k/a STANLEY MULLIS, a/k/a  
18 STAN MULLIS, and ANGEL C. MULLIS,  
a/k/a ANGEL MULLIS, a/k/a ANGEL  
19 SANTILLI, and JONATHAN ROBERT  
JOSSEL, a/k/a JONATHAN JOSSEL, and  
20 MICHAEL ANTHONY PERGOLINI, a/k/a  
MICHAEL A. PERGOLINI, a/k/a MICHAEL  
21 PERGOLINI, a/k/a MICHAEL A.  
PERCOLINI, and DOES I-X, and ROE  
22 CORPORATIONS XI-XX, et al.,

23 Defendants.

Case No.: 2:18-cv-01765-JAD-DWF

**STIPULATION RE: REMAND OF  
ACTION TO THE EIGHTH JUDICIAL  
DISTRICT COURT, STATE OF  
NEVADA, CLARK COUNTY**

ECF No. 6, 8

24 The parties, Plaintiff Paul D.S. Edwards, in *pro se*, and Defendants, by and through their  
25 counsel of record, the law firm Clark McCourt, present the following facts and stipulation.

- 26 1. Plaintiff commenced this action in the Eighth Judicial District Court, Clark County,  
27 State of Nevada in Case No. A-18-776375-C by the filing of a complaint on June 19,  
28 2018.

2. Defendants filed their Petition For Removal on September 11, 2018, and completed the removal process by filing a conformed copy of the Petition For Removal with the Eighth Judicial District Court, State of Nevada, County of Clark, on September 12, 2018.

3. After some discussion, the parties have agreed that the Plaintiff's action should be remanded to the Eighth Judicial District Court, State of Nevada, County of Clark.

**THEREFORE,**

**IT IS HEREBY STIPULATED** that Defendants will not oppose Plaintiff's Motion to Remand This Case Back To The Eighth Judicial District Court, State of Nevada, County of Clark;

**IT IS FURTHER STIPULATED** that the court grant that portion of Plaintiff's Motion remanding the case to the Eighth Judicial District Court, State of Nevada, County of Clark; and

**IT IS FURTHER STIPULATED** that each party bear their own costs, expenses and attorney's fees associated with the removal and remand.

DATED this 18<sup>th</sup> day of October, 2018.      DATED this 1<sup>st</sup> day of October, 2018.

CLARK MCCOURT

Brian P. Clark  
Nevada Bar No. 4236  
Lukas B. McCourt  
Nevada Bar No. 11839  
7371 Prairie Falcon Road, Suite 120  
Las Vegas, NV 89128  
Attorneys for Defendants

Paul D.S. Edwards  
713 Wheat Ridge Lane, Unit 203  
Las Vegas, NV 89145  
Plaintiff, *pro se*

## ORDER

Based on the parties' stipulation [8] and good cause appearing, IT IS HEREBY ORDERED that the Motion to Remand [6] is GRANTED. This action is remanded back to the Eighth Judicial District Court, Case No. A-18-776375-C, Dept. 16, and the Clerk of Court is directed to CLOSE THIS CASE.

U.S. District Judge Jennifer A. Dorsey  
Dated: October 2, 2018